



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
700 Heinz Avenue
Berkeley, California 94710-2721



Arnold Schwarzenegger
Governor

September 15, 2006

Mr. Paul Montney
Director of Environmental Affairs
Georgia-Pacific Corporation
P.O. Box 105605
Atlanta, GA 30348-5605

Dear Mr. Montney,

The Department of Toxic Substances Control (DTSC) has received a revised Backfill / Interim Cap Design Memorandum (Interim Cap Design Memo) for Georgia-Pacific Corporation's Wood Products Manufacturing Facility at 90 West Redwood Avenue, Fort Bragg, dated September 8, 2006. The Design Memo has been revised in response to draft comments presented to you in an e-mail dated September 1, 2006. The Interim Cap Design Memo has been revised to incorporate DTSC's September 1, 2006 comments.

DTSC has also received a Concrete Stockpile Characterization Data Memorandum (Concrete Memo) dated September 13, 2006. According to the Concrete Memo, Georgia Pacific Corporation (G-P) intends to crush and reuse the stockpiled concrete that contains concentrations of detected constituents below screening levels (California Human Health Screening Levels for residential soils, and/or USEPA Region IX Preliminary Remediation Goals for residential soils). The reused concrete must also be non-hazardous (not exceeding soluble threshold limit concentrations (STLC) and Toxicity Characteristic Leaching Procedure (TCLP) requirements). This "Clean Crushed Concrete" will then be reused as onsite backfill in the Wet Interim Cap design proposed in Figure 1 of the Interim Cap Design Memo. The Concrete Memo specifies the concrete tests conducted and provides the analytical results available as of September 13, 2006 from the onsite concrete stockpiles located on a sealed asphalt pad north of the water tower and west of former Sawmill #1's green chain.

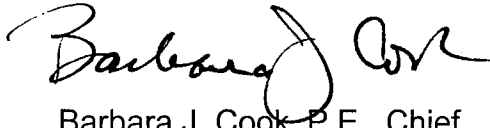
Based on our review, the Interim Cap Design Memo is adequate for the proposed backfilling/capping activities. Only concrete with detected constituents below residential soil screening levels that also meets non-hazardous waste criteria may be reused onsite as "Clean Crushed Concrete" backfill for the Wet Interim Cap. Please be aware that G-P will be required to implement dust control measures to minimize fugitive dust emissions during all concrete crushing, concrete moving, backfilling, and interim capping activities.

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DTSC is aware of G-P's current California Coastal Commission permit condition that requires completion of all onsite construction activities by October 15. However, multiple individual data memorandums for one proposed onsite activity will no longer be acceptable forms of documentation. Complete documentation in a stand-alone report or work plan will be required for DTSC review and approval in the future. For example, all data for the concrete quality should have been presented as an attachment to a stand-alone backfill / cap design work plan. Presentation of the complete documentation in stand-alone reports or work plans eliminates the need for an iterative review process and simplifies overall document management and approval.

If you have any questions, you may contact Mr. Ryan Miya of my staff at (510) 540-3775.

Sincerely,



Barbara J. Cook, P.E., Chief
Northern California Coastal
Cleanup Operations Branch

cc: Ms. Carol Stephens
Director of Real Estate Operations
Georgia-Pacific Corporation
P.O. Box 105605
Atlanta, GA 30348-5605

Ms. Bridgette DeShields
BBL
2033 North Main Street, Suite 340
Walnut Creek, California 94596

Mr. John Rogers
Mendocino County Environmental Health Department
Environmental Health Director
501 Low Gap Road
Room 1326, Ukiah, CA 95482

Mr. James Baskin
California Coastal Commission
North Coast District Office
710 E Street, Suite 200
Eureka, CA 95501

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cc continued:

Ms. Linda Ruffing, City Manager
Fort Bragg Community Redevelopment Department
416 N. Franklin Street
Fort Bragg, CA 95437

Mr. Craig Hunt
North Coast Regional Water Quality Control Board
5550 Skylane Boulevard, Suite A
Santa Rosa, California 95403

Ms. Vivian Murai
Office of Legal Affairs
Department of Toxic Substances Control
1001 I Street
P.O. Box 806
Sacramento, California 95812